

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Westside Lead - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #3
Progress
Westside Lead
C482
ATLANTA, GA
Latitude: 33.7654320 Longitude: -84.4087470

To: James Webster, USEPA R4 ERRPB

From: Chuck Berry, OSC

Date: 3/4/2020

Reporting Period: 02/16/2020 - 02/29/2020

1. Introduction

1.1 Background

Site Number:	C482	Contract Number:	
D.O. Number:	68HE0420F0006	Action Memo Date:	11/4/2019
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/6/2020	Start Date:	1/6/2020
Demob Date:		Completion Date:	
CERCLIS ID:	GAN000407160	RCRIS ID:	
ERNS No.:		State Notification:	GA EPD
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Other - Historical use of contaminated fill prior to implementation of the Resource Conservation and Recovery Act (RCRA).

1.1.2 Site Description

1.1.2.1 Location

The Westside Lead Site is located in the English Avenue and Vine City neighborhoods of Atlanta, just west of downtown. In January, 2020, the site boundaries were expanded. The new site is bounded by the former CSX rail line and Northside Drive to the east, North Avenue to the north, Oliver Street and Sciple Terrace to the west, and Foundry Street to the south. The address used is 395 Elm Street, Atlanta, Fulton County, Georgia 30314. The Site coordinates are Latitude: 33.7654320, Longitude: -84.4087470.

The Site is primarily residential with commercial and institutional property interspersed throughout, but particularly along the eastern border abutting the former rail line. Additionally, several large City parks are included in the new boundary. Based on property zoning codes, there are an estimated 1058 residential properties within the entirety of the boundary, both Phase 1 and 2. Most are single-family homes, although there are several multi-family properties within the area. Nearly all of the owners are absentee landlords renting out the property. Additionally English Avenue has a high percentage of unimproved or abandoned property. The 2008 housing crisis left many properties distressed, and many properties remain abandoned. A parcel-by-parcel verification of the new area, termed "Phase 2" is underway. This process was already performed in Phase 1 at the outset of response activity. The final number of properties will be determined based on the actual-use survey of the parcels.

1.1.2.2 Description of Threat

Atlanta's west side neighborhoods were developed in the late 1880s through the first half of the 20th Century. During that time, several foundries operated in the Atlanta area, and the slag generated as a byproduct was reportedly available for use as fill. Based on subsequent investigation, slag appears to underlie not only large areas spanning multiple properties, but also in smaller, discrete locations where the owner or contractor needed to fill in low areas or reinforce driveways or alleyways with a readily-available source of road bed.

The slag used in Westside has high concentrations of lead. Portions of the slag pulverized and analyzed by Emory University, showed lead concentrations in the slag were over 6,100 milligrams per kilogram (mg/kg), or parts per million (ppm). The slag is intermixed with a range of smaller-sized particles, forming a soil layer that is, in places, at least 10 feet thick. This soil layer has lead concentrations greater than 400 ppm in the particle size range smaller than 150 microns. Lead is a hazardous substance as defined at title 40 of the Code of Federal Regulations, Section 302.4 (40 CFR 302.4). EPA has promulgated a Removal Management Level (RML) of 400 ppm lead for residential exposure scenarios. There are lead concentrations in residential soil at the Westside Lead site that exceed the EPA RML that are a threat to human health for persons living on or near these properties.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In 2018, a Doctoral candidate working in the Saikawa Lab at Emory University was studying lead and other heavy metal concentrations in urban gardens in Atlanta. Working with the Historic Westside Gardens club, Emory identified high lead levels in soil from lots surrounding the garden on Elm Street in English Avenue, with lead concentrations as high as 4,500 ppm. Subsequent investigation led to an unusual rock being shown to the student's adviser, who was also a Risk Assessor for the EPA Region 4 Superfund and Emergency Management Division's Superfund Scientific Support Branch. The EPA employee immediately identified the rock as slag. Since Emory used a sampling and analysis method similar to EPA's methods, the data were assessed to have reasonable quality. The Risk Assessor brought the information to the Region 4 Emergency Response, Removal, Prevention, and Preparedness Branch (ERRPPB) for review.

The data was subsequently turned over to the Georgia Department of Environmental Protection for assessment. In November 2018 GA EPD requested EPA initiate a Removal Site Evaluation, and On-Scene Coordinator (OSC) Chuck Berry was assigned the project. A meeting with the OSC, GA EPD, the City of Atlanta, and the Superfund Technical Assessment and Response Team (START) was held in December 2018 to discuss a sampling approach. EPA agreed to conduct the sampling and then return to the other entities with the results to discuss any future site plans.

Due to the Federal Government shutdown in December 2018 and January 2019, sampling activities did not commence until late March 2019. An initial study area of 60 parcels was selected from the 2-block area surrounding the Elm Street garden. The Superfund Technical Assessment and Response Team (START) contractor, Oneida Total Integrated Services (OTIE) sampled the lots using the Incremental Sampling Method (ISM). ISM attempts to obtain high-quality statistical data that more accurately reflects the average concentration across any area. Each improved property with a house was divided up into smaller exposure units (e.g. front/back/side). Additionally, any areas of increased exposure (e.g. play areas, gardens) were sampled independently. Unimproved lots were sampled as a single unit. The soil was sieved to obtain the fraction of particle sizes less than 150 microns (μm) in diameter, as this is believed to more accurately reflect the average particle size one is exposed to after working or playing in the soil (based on the supposition that most adults and children brush the coarse material from their hands once done). An X-Ray Fluoroscope (XRF) was used to analyze the sieved soil, and this was then split to obtain analytical laboratory results from the Region 4 Regional Laboratory in Athens, Georgia. Based on a statistical review of the data, initial samples achieved a 99.7% correlation with XRF data for sieved samples. This has allowed XRF to be the primary analytical method used at the site instead of relying on laboratory data turnaround.

Access to only 23 of the initial properties was obtained. However, 15 of those properties showed lead concentrations in at least one area of the property exceeded the Region 4 RML of 400 ppm. The OSC then expanded the site investigation area to encompass a total of 368 residential properties. Then, another expansion occurred in January 2020 to a preliminary total of 1058 residential parcels. This total number will be refined based on the parcel verification, currently underway. Sampling continues as additional access agreements are received. The status of the sampling is given in Section 2.1.4 Progress Metrics. Generic resident information (number of residents and approximate ages) were collected where possible in order to facilitate prioritizing removals.

In November, 2019, an Action Memorandum was signed by the Region 4 Superfund and Emergency Management Division Director. The AM approved up to 2 feet of contaminated soil be removed from properties with lead concentrations greater than 400 ppm. Because of the impending holiday schedules, the OSC opted to wait until after the first of the year to mobilize to the site and begin construction of staging areas.

2. Current Activities

2.1 Operations Section

2.1.1 Previous Response Actions

The OSC used resident demographic data collected during the RSE to prioritize parcels for removal. Parcels were placed into a tiered system depending on the lead levels on the property and the ages of the residents living there. This approach is consistent with other Removal sites in Region 4. However, due to the large number of unimproved / abandoned lots in English Avenue, another tier was added to the standard 4-tier system to accommodate the lower risk posed by these lots. The tiers are:

Tier 1: Parcels with children under 14 living on them with lead levels greater than or equal to 1,200 ppm.

Tier 2: Parcels with children under 14 living on them with lead levels less than 1,200 ppm but greater than or equal to 400 ppm.

Tier 3: Parcels with adults age 14 and over living on them with lead levels greater than or equal to 1,200 ppm.

Tier 4: Parcels with adults age 14 and over living on them with lead levels less than 1,200 ppm but greater than or equal to 400 ppm.

Tier 5: Unimproved or abandoned property.

Use of the tiers is not mandated by any Agency-wide or Regional policy and only serves as guide for prioritizing the highest risk properties. Other extenuating factors may alter the sequencing of removals. Additionally, the database used to generate these tiers is not complete. Many properties were sampled without being able to interview the residents (most frequently when a landlord signs for access and the tenant is not home with the sampling occurs). Thus, the tiering numbers reported in Section 2.1.5 do not add up to the total number of properties slated for removal. There are currently no Tier 1 properties.

CMC, Inc, the Emergency and Rapid Response Services (ERRS) contractor mobilized to the site on January 6, 2020, and began construction of staging areas for fill and contaminated soil. Tetra Tech, Inc., the Superfund Technical Assessment and Response Team (START) contractor also mobilized to the site to assist with residential relations and air monitoring.

Residential soil excavation began on January 27, 2020. For a detailed accounting of previous activity during this response, please see the prior Pollution Reports.

2.1.2 Response Actions This Reporting Period

START began the process of verifying the zoning use codes for all the parcels in Phase 2. This should be complete by the end of the next reporting period.

ERRS began shipping contaminated soil off site to the Waste Management Pine Bluff Landfill in Ball Ground, GA. During the week of February 16 - 22, ERRS completed excavation of all properties draining

into the sewer drain behind 406 Elm Street, which included the two Tier 2 properties that were initially targeted for removal. Rain during the week severely limited site activities. Over 4 inches of rain was received during the week. Excavation was possible during the rain, but backfill activities were not able to begin. ERRS demobilized for a scheduled break from February 23 until March 1.

ERRS has currently excavated 26,000 square feet to depths of up to 3 feet in places. Over-excavation was necessary to obtain acceptable grades to drain the entire area into a single drain located in the rear of 406 Elm Street. With the exception of the areas directly next to the sidewalks on Elm Street, all excavated areas remained exposed during the break.

Sampling continued, but at a slower rate due to the rain. See the metrics below for progress details.

2.1.2 Outreach and Community Involvement

EPA initiated public outreach to inform residents of the expanded site boundaries and attempt to obtain access agreements for property located in Phase 2. A fact sheet and access agreements were mailed out to all owners and tenants in Phase 2. A public meeting is scheduled for March 12, 2020.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

To date, no PRPs have been identified.

2.1.4 Progress Metrics

Metrics are current as of the end of the reporting period.

SAMPLING	
Total Properties (estimated):	1058
Access Granted:	157
Properties Sampled:	140
Properties Requiring Removal:	72
REMOVALS	
Properties Requiring Removal:	72
Properties in Progress:	9
Properties Completed:	0
Properties Remaining:	72
DISPOSAL	
Tons of non-hazardous soil:	1,193

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Properties with a soil lead level in at least one decision unit will be scheduled. Priority will be given to properties with young children living at or who are frequent visitors the residence. Soil excavation will be from 0-1 feet generally. Residents will be urged to allow removal of trees from the property. Restoration will be made to as-near the original condition as possible. Sampling will continue as access agreements are received.

2.2.1.2 Next Steps

The expansion into Phase 2 will require enhanced START participation and, consequently, funding. Outreach efforts will be enhanced to collect a greater percentage of resident demographic data used for tiering properties for removal.

2.2.2 Issues

Rain continues to be the biggest issue at the site.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$950,000.00	\$500,000.00	\$450,000.00	47.37%

TAT/START	\$60,000.00	\$20,000.00	\$40,000.00	66.67%
Intramural Costs				
Total Site Costs	\$1,010,000.00	\$520,000.00	\$490,000.00	48.51%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

STAFFING THIS REPORTING PERIOD

OSCs: 1
CICs: 1
START: 1
ERRS: 10

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.